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Federal Defenders OF NEW YORK, INC.

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David E. Patton

Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

Via ECF

The Honorable Gregory H. Woods United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 July 20, 2020

Re: United States v. Louis Bravo, 18 CR 283 (GHW)

Dear Judge Woods:

We write with the consent of the Government to respectfully request an adjournment of the hearing currently scheduled for July 21, 2020, due to the ongoing public health crisis. Both Mr. Bravo and counsel have underlying health issues that create significant concerns about the risks associated with appearing in person in the courthouse.

Mr. Bravo still intends to change his plea, and is eager to proceed in this matter in a timely manner. To that end, we respectfully propose that the Court order a Pre-Sentence Investigation so that the Court can proceed to a combined plea and sentencing once normal court operations resume. We propose an adjournment of approximately four months for this purpose. The Government does not object to this request.

Thank you for your consideration of this request.

Application denied without prejudice. The Court does not know the positions of the parties with respect to a potential exclusion of time through the proposed adjourned date. The Court has availability for a joint plea and sentencing hearing on November 20, 2020 at 3:00 p.m. Any renewal of this application should state the parties' positions with respect to the exclusion of time in accordance with the Court's Individual Rules of Practice. SO ORDERED

July 20, 2020

GREGORY H. WOODS
United States District Judge

Respectfully submitted,

Tamara L. Giwa Jennifer Willis

Counsel for Louis Bravo

Federal Defenders of New York

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Cc: AUSA Emily Johnson (via ECF)